## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 2:24-cr-125-ECM
	)	
KYLE BENJAMIN DOUGLAS CALVERT	)	

## MOTION TO DECREASE DEFENDANT'S OFFENSE LEVEL PURSUANT TO UNITED STATES SENTENCING GUIDELINE § 3E1.1(b) FOR ACCEPTANCE OF RESPONSIBILITY

The United States of America submits this motion to reduce the defendant's offense level by one level pursuant to § 3E1.1(b) of the Sentencing Guidelines. See U.S.S.G. § 3E1.1(b).

The government files this motion because the defendant assisted authorities in the investigation and prosecution of the defendant's own misconduct by timely notifying authorities of the defendant's intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and allowing the government and this Court to efficiently allocate their resources.

Accordingly, pursuant to § 3E1.1(b), a one-level reduction is appropriate. Combined with the two-level reduction applied to the defendant's offense level pursuant to § 3E1.1(a), a total reduction of three levels should be applied to the defendant's offense level for acceptance of responsibility.

Respectfully submitted this 4<sup>th</sup> day of November 2024.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on November 4, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for the defendant.

Respectfully submitted,

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